

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 15-10037-IT
)	
ROBERT RANG,)	
Defendant.)	

GOVERNMENT'S TRIAL WITNESS LIST

Now comes the United States, by its attorneys, William D. Weinreb, Acting United States Attorney, and David G. Tobin and Anne Paruti, Assistant U.S. Attorneys, and hereby notifies the Court that the United States anticipates calling the following witnesses at the trial in this matter:

- 1) Postal Inspector Michael Connelly;
- 2) Postal Inspector Rachel Heintz;
- 3) Postal Inspector Scott W. Kelley;
- 4) Postal Inspector Mark P. Scichilone;
- 5) Massachusetts State Trooper Robert Smith;
- 6) Plymouth County Deputy Sherriff and Digital Evidence Forensic Examiner Tara Cruza;
- 7) Plymouth Police Detective Lieutenant Antonio Gomes;
- 8) Plymouth Police Officer James Keegan;
- 9) Plymouth Police Officer Kenneth Masterson;
- 10) Plymouth Police Detective Brian Stas;
- 11) Alleged minor victim;
- 12) Alleged minor victim's mother;
- 13) Alleged minor victim's grandmother;

14) Mother of minor male from New York;

15) Father of minor male from New York;

16) Verizon Wireless keeper of records.

In order to protect the privacy of witnesses numbered 11 through 15, the United States has not included their names and addresses. The undersigned attorney for the United States believes that the defense attorney has been provided with the names and other identifying information of witnesses 11 through 15, and agrees to confirm their identities in a letter or email. The United States understands that the identities of witnesses 11 through 15 will be revealed to the public at trial, if the witnesses testify.

The United States reserves the right to amend this witness list.

Respectfully submitted,

WILLIAM D. WEINREB
Acting United States Attorney

By: /s/ David G. Tobin
DAVID G. TOBIN
ANNE PARUTI
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ David G. Tobin
DAVID G. TOBIN
Assistant United States Attorney